## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS BEAUMONT DIVISION

UNITED STATES OF AMERICA	§	
	§	
V.	§	No. 1:17-CR-40-1
	§	
TRAVIS JOSEPH LEGER	§	

## **ELEMENTS OF THE OFFENSE**

You are charged in Count One of the Indictment with a violation of Title 18, United States Code, Section 371, Conspiracy.

The essential elements which must be proven to establish the Title 18, United States Code, Section 371 violation are:

**First**: The defendant agreed with at least one other person to violate the Lacey Act (Title 16, United States Code, Sections 3372 and 3373);

**Second:** That defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and

**Third:** That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the indictment, in order to accomplish some object or purpose of the conspiracy.

Respectfully submitted,

BRIT FEATHERSTON
ACTING UNITED STATES ATTORNEY

/s/ Joseph R. Batte
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## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon counsel for the defendant, David Grove, by electronic filing, on the 11<sup>th</sup> day of August 2017.

/s/ Joseph R. Batte
Joseph R. Batte
Assistant United States Attorney